

February 12, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *RC Technologies Corporation*
WT Docket No. 06-136
Transition Initiation Plan, Request for Waivers and Status Report
Watertown, South Dakota (B464)

Dear Ms. Dortch:

Pursuant to Section 27.1231(f) of the Commission's Rules and the Memorandum Opinion and Order ("*Order*") of the Wireless Telecommunications Bureau ("*Bureau*"),¹ RC Technologies Corporation ("*RCT*") hereby submits this Transition Initiation Plan ("*Plan*") for the specified Broadband Radio Service ("*BRS*") and Educational Broadband Service ("*EBS*") licensees in the Watertown, South Dakota Basic Trading Area ("*BTA*"). RCT also requests waiver of certain administrative requirements related to the transition and reports on the status of its transition activities.

Transition Initiation Plan

Pursuant to Section 27.1231(f) of the Commission's Rules, RCT provides the following information:

Section 27.1231(f)(i) – RCT will be transitioning the Watertown, South Dakota BTA (B464).

Section 27.1231(f)(ii) – A list of the BRS and EBS licensees in the BTA is attached as Exhibit 1 hereto. Exhibit 2 lists those licensees that previously filed self-transition notices pursuant to Section 27.1236 and thus will not be included in this transition.

¹ *RC Technologies Corporation*, Memorandum Opinion and Order, DA 10-1033, rel. Jan. 8, 2010 ("*Order*"). The *Order* stated that RCT would have thirty (30) days from its release to submit this Plan. The Federal government (including the Commission) was closed on the due date, February 8, 2010, as well as February 9-11, 2010. In accordance with Section 1.4(e)(1) of the Commission's Rules, the closure dates are defined as "holidays." This Plan is being filed on the first day following the "holidays" and therefore is timely filed.

Section 27.1231(f)(iii) – RCT’s current “best estimate” for completing the transition is April 30, 2010.

Section 27.1231(f)(iv) – RCT has determined that it is unnecessary to transition any BRS or EBS licensees in adjacent or adjoining BTAs in order to avoid interference to licensees in the Watertown BTA being transitioned. First, it is believed that all neighboring BTAs and the licensees with GSA centerpoints therein are included within the transitions for such BTAs. Second, in the *Order*, the Bureau acknowledged the potential for harmful interference to licensees in neighboring BTAs and waived the rules in recognition of the public interest benefits that would arise through operation pursuant to RCT’s waiver request.

Section 27.1231(f)(v) – RCT is the only proponent for the Watertown BTA. It is coordinating transition activities with other BRS and EBS licensees in the BTA, including Data Truck, L.L.C. (“Data Truck”), the holder of the Watertown BTA authorization.

Section 27.1231(f)(vi) – RCT certifies that it has sufficient funds available to pay the reasonable expected costs of the transition.

Request for Waivers

RCT requests waiver of Section 27.1231(f)(vi) because it has not received responses to its Pre-Transition Data Requests (“PTDR”) and thus its certification is not based on those responses. The *Order* required RCT to file the Plan within 30 days of its release, and it thus was not possible for RCT and the recipients of the PTDRs to complete the PTDR process as described in Section 27.1231(d), which is intended to precede the filing of Transition Initiation Plans.

RCT also requests waiver of the transition-related deadlines established in Section 27.1231, *et seq.* The *Order* was granted after the conclusion of the transition period such that it is not possible for RCT to comply with the deadlines for initiating and completing the transition. Further, the *Order* required RCT to file its Plan before it was possible to complete the PTDR process, which requires at least 45 days. Absent waiver, RCT would not be able to transition the BTA and the benefits to the public, RCT, Data Truck and the other BRS and EBS licensees would not be realized. Given the fact that RCT could not have complied with the deadlines, waiver of the transition-related deadlines would help expedite the transition process and thus would be consistent with the public interest.

Status Report

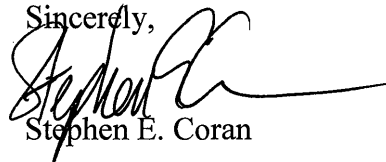
RCT is in the process of finalizing the PTDRs. As discussed with the Bureau, RCT plans to incorporate the Transition Plan required by Section 27.1232(b) and the Transition Notice required by Section 27.1231(e) into the PTDR correspondence and obtain written confirmation from each licensee that (1) no EBS facilities are required to be transitioned and no EBS programming is required to be migrated, and (2) the licensees have no objection to the Transition Plan and will not be submitting counterproposals such that the 90-day Transition Planning Period can be truncated. RCT plans to meet with the licensees listed on Exhibit 1 over the next two weeks to explain the transition process and obtain such confirmations.

In addition, RCT has drafted the transaction agreements with Data Truck and transmitted those documents to Data Truck for its review. As discussed in the *Order*, these agreements involve the lease and sublease of spectrum rights, as well as interference management and other business transactions. Data Truck is fully engaged in this process and RCT expects agreements to be signed in the near future. The agreements contemplate the filing of applications with the Commission once they are executed. In addition, RCT recently entered into an interference management agreement with Santel Communications Cooperative (“Santel”), which operates a broadband access service in the Huron, South Dakota area. If necessary, RCT also will enter into formal agreements with Northern Wireless Communications and Sioux Valley Wireless, Inc. with respect to their nearby BRS/EBS systems.

Barring unforeseen complications, RCT anticipates that the transition and transactional processes can be completed by March 15, 2010, at which time RCT will submit the Post-Transition Notification required by Section 27.1235. RCT and the transitioning licensees also will file the various modification and secondary market applications necessary to implement the transition to the new frequency assignments and the transactions with Data Truck.

RCT will provide the Bureau with updates on the status of its transition and transaction activities as requested by Commission staff.

Please contact undersigned counsel to RCT if there are any questions concerning this matter.

Sincerely,

Stephen E. Coran

Enclosure

cc: John Schauble
Nancy Zaczek

Exhibit 1
List of BRS and EBS Authorizations to be Transitioned

Watertown, South Dakota

Channels	Licensee	Service	Call Sign
BRS	Data Truck, L.L.C.	BRS	B464

Sisseton, South Dakota

Channels	Licensee	Service	Call Sign
B1-B4	Sisseton School District	EBS	WNC879
C1-C4	RC Technologies Corporation	Commercial EBS	WQDZ549
D1-D4	Sisseton School District	EBS	WNC878
E1-E4	RC Technologies Corporation	BRS	WLK365
F1-F4	RC Technologies Corporation	BRS	WLK366
H1-H3	RC Technologies Corporation	BRS	WNTK289

Kranzburg, South Dakota

Channels	Licensee	Service	Call Sign
B1-B4	Deuel School District No. 19-4	EBS	WNC960
D1-D4	Waverly School District No. 14-5	EBS	WNC959
E1-E4	RC Technologies Corporation	BRS	WLK330
F1-F4	RC Technologies Corporation	BRS	WLK327
G1-G4	Summit School District No. 54-6	EBS	WNC826
H1	RC Technologies Corporation	BRS	WNTK288

Exhibit 2
List of BRS and EBS Authorizations that Filed Self-Transition Notices
(filed April 21, 2009)

Willow Lake, South Dakota

Channels	Licensee	Service	Call Sign
B1-B4	Willow Lake School District	EBS	WNC820
D1-D4	DeSmet School District 38-2	EBS	WNC827
E1-E4	RC Technologies Corporation	BRS	WLK323
F1-F4	RC Technologies Corporation	BRS	WLK319
G1-G4	RC Technologies Corporation	Commercial EBS	WQCN267
H1-H2	RC Technologies Corporation	BRS	WNTK294